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*Attorneys for Defendant Facebook, Inc.*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION**

MAXIMILIAN KLEIN, et al., on behalf of  
themselves and all others similarly situated,

Plaintiffs,

v.

FACEBOOK, INC., a Delaware Corporation  
headquartered in California,

Defendant.

Case No. 5:20-cv-08570-LHK

**STIPULATION TO ENTER  
STIPULATED DEPOSITION,  
EXPERT, AND PRIVILEGE  
PROTOCOLS**

Judge: Hon. Virginia K. DeMarchi

1 Plaintiffs Maximilian Klein, *et al.* and Defendant Facebook, Inc. (collectively, the “Parties”),  
2 by and through their respective counsel, hereby stipulate as follows:

3 WHEREAS, the Parties submitted Proposed Stipulated Deposition, Expert, and Privilege  
4 Protocols as exhibits to Letter Briefs presenting disputed provisions of those Protocols to the Court  
5 for resolution on September 20, 2021 (Dkt. Nos. 132, 134 and 135);

6 WHEREAS, the Court heard argument on the disputed provisions of the Proposed Stipulated  
7 Deposition, Expert, and Privilege Protocols on August 31, 2021 (Dkt. No. 136);

8 WHEREAS, the Parties have, through agreement, resolved some of the disputed provisions  
9 of the Proposed Stipulated Deposition, Expert, and Privilege Protocols (Dkt. No. 148);

10 WHEREAS, the Court has issued several Orders resolving all remaining disputed provisions  
11 of the Proposed Stipulated Deposition, Expert, and Privilege Protocols (Dkt. Nos. 149-51, 153 and  
12 155);

13 WHEREAS, the Parties have modified the previously submitted Proposed Stipulated  
14 Deposition, Expert, and Privilege Protocols to reflect the resolutions reached by the Parties and the  
15 Court; and

16 WHEREAS, the Parties jointly and respectfully request that the Court enter the Parties’  
17 Proposed Stipulated Deposition Protocol, Proposed Stipulated Expert Protocol, and Proposed  
18 Stipulated Privilege Protocols, submitted herewith.

19 THEREFORE, IT IS HEREBY SO STIPULATED.  
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1 DATED: October 28, 2021

Respectfully submitted,

2 By: /s/ Shana E. Scarlett

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**ATTESTATION OF KRISTEN M. ANDERSON**

This document is being filed through the Electronic Case Filing (ECF) system by attorney Kristen M. Anderson. By her signature, Ms. Anderson attests that she has obtained concurrence in the filing of this document from each of the attorneys identified on the caption page and in the above signature block.

Dated: October 28, 2021

By /s/ Kristen M. Anderson

Kristen M. Anderson

**CERTIFICATE OF SERVICE**

I hereby certify that on this 28th day of October 2021, I electronically transmitted the foregoing document to the Clerk's Office using the CM/ECF System, causing the document to be electronically served on all attorneys of record.

By /s/ Kristen M. Anderson

Kristen M. Anderson